

Gerald E. Hawxhurst (Bar No. 220327)
jerry@cronehawxhurst.com
Joshua P. Gelbart (Bar No. 274021)
jgelbart@cronehawxhurst.com
CRONE HAWXHURST LLP
10880 Wilshire Blvd., Suite 1150
Los Angeles, California 90024
Telephone: (310) 893-5150
Facsimile: (310) 893-5195

Attorneys for Plaintiff
Alpha Investment, LLC

Stephen C. Neal (170085)
John C. Dwyer (136533)
Jeffrey M. Kaban (235743)
COOLEY LLP
Five Palo Alto Square
3000 El Camino Real
Palo Alto, CA 94306-2155
Telephone: (650) 843-5000
Facsimile: (650) 849-7400

Attorneys for Defendant
Zynga Inc.

Jacob S. Pultman (*Admitted Pro Hac Vice*)
jacob.pultman@newyork.allenoverly.com
Andrew H. Reynard (*Admitted Pro Hac Vice*)
andrew.reynard@newyork.allenoverly.com
Molly C. Spieczny (*Admitted Pro Hac Vice*)
molly.spieczny@newyork.allenoverly.com
ALLEN & OVERY LLP
1221 Avenue of the Americas
New York, NY 10020
Telephone: (212) 610-6300
Facsimile: (212) 610-6399

Attorneys for Plaintiff
Alpha Investment, LLC

Scott Vick (No. 171944)
Jessica Han (No. 228859)
Lital Gilboa (No. 263372)
VICK LAW GROUP
800 West Sixth Street, Suite 1220
Los Angeles California 90017
Telephone: (213) 784-6225
Facsimile: (213) 985-7155
Scott@vicklawgroup.com
jessica@vicklawgroup.com
lital@vicklawgroup.com

Attorneys for Defendant
Andrew Trader

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

ALPHA INVESTMENT, LLC,

Plaintiff,

v.

ZYNGA INC. and ANDREW TRADER,

Defendants.

CASE NO. CV 11-3500-JSW

**STIPULATION REGARDING CASE
MANAGEMENT CONFERENCE**

**[PROPOSED ORDER SUBMITTED
HEREWITH]**

WHEREAS, on April 2, 2012, Plaintiff filed a First Amended Complaint;

WHEREAS, motions to dismiss, a motion to intervene, and a motion to strike were filed

1 by Defendants on May 2, 2012.

2 WHEREAS, on June 12, 2012, the Court entered an Order denying Defendants' motions to
3 dismiss, denying Defendant Trader's motion to strike with respect to Alpha's request for
4 mandatory injunction, granting Defendant Trader's motion to strike with respect to Alpha's
5 request for attorney's fees, and granting Defendant Trader's intervene motion to intervene,
6 continuing the Case Management Conference to June 29, 2012 ("CMC") and ordering the parties
7 to file a revised joint case management statement by no later than June 22, 2012;

8 WHEREAS, on June 20, 2012, Defendant Trader filed an Answer to the First Amended
9 Complaint and Cross-Complaint;

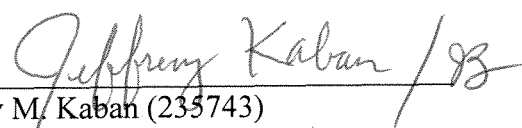
10 WHEREAS, the parties are in the process of meeting and conferring to finalize a
11 settlement agreement that will result in a dismissal of Alpha's claims against Defendants with
12 prejudice;

13 WHEREAS, the parties have conferred and agreed that continuing the CMC for two weeks
14 to July 13, 2012 will allow the parties the necessary time to finalize the dismissal of Alpha's
15 claims against Defendants with prejudice prior to filing a joint case management statement,
16 thereby serving the interests of judicial economy;

17 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between
18 the parties to this action, through the undersigned counsel of record, that, with the consent of the
19 Court, the CMC be adjourned until July 13, 2012 at 1:30 p.m., or until such a later time as
20 determined by the Court.

21 DATED: June __, 2012

COOLEY LLP

22
23 By  /JB
24 Jeffrey M. Kaban (235743)
25 Attorneys for Defendant Zynga Inc.
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1 DATED: June 22, 2012

VICK LAW GROUP, APC

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3 By Scott Vick / L.G.
4 Scott Vick (171944)
5 Attorneys for Defendant Andrew Trader
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7 DATED: June __, 2012

ALLEN & OVERY LLP

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9 By _____
10 Jacob S. Pultman (admitted *pro hac vice*)
11 Attorneys for Plaintiff Alpha Investment, LLC

12 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

13 DATED: June ____, 2012

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15 _____
16 HONORABLE JEFFREY S. WHITE
17 UNITED STATES DISTRICT JUDGE
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1 DATED: June __, 2012

VICK LAW GROUP, APC

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By _____
Scott Vick (171944)
Attorneys for Defendant Andrew Trader

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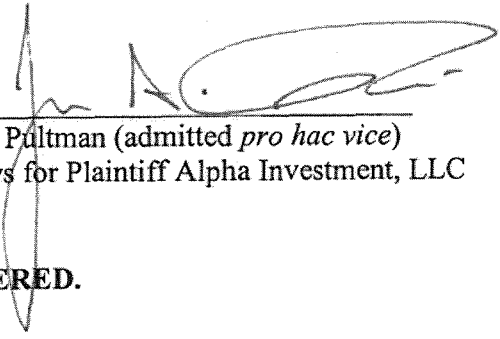
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DATED: June 22, 2012

ALLEN & OVERY LLP

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By 
Jacob S. Pultman (admitted *pro hac vice*)
Attorneys for Plaintiff Alpha Investment, LLC

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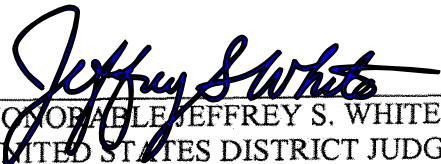
PURSUANT TO STIPULATION, IT IS SO ORDERED.

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DATED: June 26, 2012

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HONORABLE JEFFREY S. WHITE
UNITED STATES DISTRICT JUDGE

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